East Anglia ONE North and East Anglia TWO Offshore Windfarms

Applicants' Comments on Suffolk County Council's Deadline 7 Submissions

Applicant: East Anglia TWO and East Anglia ONE North Limited
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Applicable to East Anglia ONE North and East Anglia TWO

Revision Summary				
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Description of Revisions			
Rev	**Page**	**Section**	**Description**
001	n/a	n/a	Final for Submission

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Glossary of Acronyms

AIL	Abnormal Indivisible Load
CoCP	Code of Construction Practice
DCO	Development Consent Order
DEFRA	Department for Energy, Food and Rural Affairs
ESDAL	Electronic Service for Delivery for Abnormal Loads
ES	Environmental Statement
ESC	East Suffolk Council
HR	Heavy Route
OAMP	Outline Access Management Plan
OCTMP	Outline Construction Traffic Management Plan
OODMP	Outline Operational Drainage Management Plan
SCC	Suffolk County Council
SuDS	Sustainable Drainage System
SZC	Sizewell C

Glossary of Terminology

Applicants	East Anglia TWO Limited and East Anglia ONE North Limited
East Anglia ONE North project	The proposed project consisting of up to 67 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.
East Anglia TWO project	The proposed project consisting of up to 75 wind turbines, up to four offshore electrical platforms, up to one construction, operation and maintenance platform, inter-array cables, platform link cables, up to one operational meteorological mast, up to two offshore export cables, fibre optic cables, landfall infrastructure, onshore cables and ducts, onshore substation, and National Grid infrastructure.

1 Introduction

1. This document presents the Applicants' comments on Suffolk County Council's (SSC) Deadline 7 submissions as follows.

    - ***Section 2.1*** – Comments of Suffolk County Council as Archaeology Authority (REP7-077);
    - ***Section 2.2*** – Comments of Suffolk County Council as Lead Local Flood Authority (REP7-078); and
    - ***Section 2.3*** – Comments of Suffolk County Council as Local Highways Authority (REP7-076).

2. This document is applicable to both the East Anglia TWO and East Anglia ONE North Development Consent Order (DCO) applications, and therefore is endorsed with the yellow and blue icon used to identify materially identical documentation in accordance with the Examining Authority's procedural decisions on document management of 23rd December 2019 (PD-004). Whilst this document has been submitted to both Examinations, if it is read for one project submission there is no need to read it for the other project submission.

2 Comments on Suffolk County Council's Deadline 7 Submissions

2.1 Comments on Suffolk County Council as Archaeological Authority

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Comments on Outline Written Scheme of Investigation (Onshore Archaeology)		
1	All amendments requested at Deadline 4 have been addressed, therefore SCC are happy to approve this document.	Noted. The Applicants welcome SCC's approval of the ***Outline Written Scheme of Investigation (Onshore Archaeology)*** submitted at Deadline 6 (REP6-005).

2.2 Comments on Suffolk County Council as Lead Local Flood Authority

3. The Applicants clarified their position in relation to the preferred surface water management system to be adopted for the substations and National Grid substation site / cable sealing end compounds at ISH11. The Applicants confirmed that the primary solution is infiltration, where practicable.

4. The Applicants acknowledge that the below comments from SCC were made prior to ISH11 and therefore do not always reflect the current position.

5. At Deadline 8, the Applicants have submitted an updated ***Outline Operational Drainage Management Plan*** (OODMP) which prioritises an infiltration only solution, if proved practicable.

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Comments on Code of Construction Practice [REP6-003]			
1	Para 46 & 48 *Where relevant, the measures listed in Paragraph X above will apply to construction works within areas identified as having an increased risk of surface water flooding.*	This change is supported and welcomed by SCC	Noted.
2	Para 123 *Where relevant, the measures listed in Paragraph 120 above will apply to construction works within areas identified as having an increased risk of surface water flooding.*	Should this reference Paragraph 122, not 120?	The Applicants have reviewed all in-text cross references and submitted an updated ***Outline Code of Construction Practice*** at Deadline 8 (document reference 8.1).
3	Para 138 *Where there is sufficient space within the Order limits, further consideration of the benefits for the potential storage of rainwater for use in construction activities*	SCC welcome the further consideration that will be given to storing and utilising rainwater for construction operations. However, this does not overcome the fundamental issue	The Applicants have submitted an updated ***Outline Code of Construction Practice*** at Deadline 8 (document reference 8.1) and a ***Flood Risk and Surface Water Drainage Clarification Note***

ID	SPR Statement	SCC Comment	Applicants' Comments
	requiring a supply of water will be provided in the final Code of Construction Practice. Any solution will take into account the need to ensure capacity is provided within the construction phase surface water drainage system to accommodate future rainfall events.	which SCC have continually raised (REP1-072 LA-05.12, REP 3-101, REP4-064, REP5-054, REP6-091) but is yet to be addressed; The Applicant must demonstrate there is sufficient space to implement their proposed mitigation during the construction phase within the Order Limits.	submitted at Deadline 8 (document reference ExA.AS-13.D8.V1) to respond to this comment.
Outline Operation Drainage Management Plan [REP6-017]			
4	Para 1 *As is normal for such nationally significant infrastructure projects, only on completion of the detailed design of the East Anglia TWO and East Anglia ONE North projects' onshore substations and National Grid substation; confirmation of the ground conditions and infiltration rates; and establishment of the catchment hydrological model, can the detailed design of the surface water management system be finalised.*	What is the precedent for this being the 'normal' approach for Nationally Significant Infrastructure Projects? SCC LLFA have worked closely with SZC Co. on the development of design proposals for Sizewell C's temporary and permanent development. This has included SZC Co. undertaking infiltration testing to inform their design, evidenced with the following references (all from SZCO Co. DCO); AS-171, paragraph 3.1.33 AS-018, paragraph 9.3.14 APP-181, 4.2.3, 4.2.6 Nonetheless, SCC have accepted that the Applicants do not have infiltration test results. This approach has been the Applicants' choice but requires them to follow a single approach of demonstrating they can deliver	The Applicants are aware of the interim guidance published by SCC which sought to revise the level of information provided in relation to outline applications, however it appears to have derived from issues with residential development. It is noted that from 31st December 2020, revised guidance is in place which requires additional upfront information. However, the Applicants note that Norfolk Boreas (APP-712), Norfolk Vanguard (REP8-054), East Anglia ONE, East Anglia THREE and further projects did not commit to infiltration testing prior to consent: This is not an exhaustive list. Please see the ***Flood Risk and Surface Water Drainage Clarification Note*** submitted at Deadline 8 (document reference ExA.AS-3.D8.V4) for the Applicants' response to comments around achieving an infiltration only solution within the Order limits. The Applicants note that reference to the '*catchment hydrological model'* should be a catchment hydraulic

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		the proposed development whilst complying with national and local minimum infiltration design standards, to achieve an infiltration only solution within the Order Limits.	model, and the ***OODMP*** (ExA.AS-3.D8.V4) submitted at Deadline 8 reflects this.
5	Para 2 *In the interim, the Applicants have assumed a worst-case scenario predevelopment greenfield discharge rate to the Friston Watercourse with no infiltration and have demonstrated within this Outline Operational Drainage Management Plan (OODMP) that sufficient space exists in the substation area to accommodate this arrangement. Incorporation of infiltration measures will complement the discharge to the Friston Watercourse.*	Statement highlighted yellow - This is only the worst-case scenario for the discharge to the Friston Main River. This is not the worst-case scenario in terms of potential land take. Statement highlighted red - Incorporation of infiltration should not simply 'complement' the discharge to Friston Main River. Infiltration must be prioritised and if deemed to be achievable and viable should be used to its maximum extent, as per CIRIA SuDS Manual, discussed in response to paragraph 6 below.	The Applicants note SCC's comments on the adoption of the sustainable drainage hierarchy and the ***OODMP*** submitted at Deadline 8 includes the appropriate updates (document reference ExA.AS-3.D8.V4). Within this document, the Applicants reiterate its commitment to a primary solution of infiltration only where practicable, considering other competing land uses such as landscaping, biodiversity enhancement and access. Please see the ***Flood Risk and Surface Water Drainage Clarification Note*** submitted at Deadline 8 (document reference ExA.AS-13.D8.V1) for a further response.
6	Para 6 *The proposed surface water drainage solution is in compliance with Suffolk County Council's sustainable drainage hierarchy (2018). Assuming a worst-case infiltration rate of 10mm/hr, an infiltration only design would be unviable for the Projects as the required 24hr half drain specification is not met. An additional secondary assessment has been undertaken at the request of Suffolk County Council, to consider an additional 1 in 10 year storm event 24 hours later to ensure sufficient*	Statement highlighted cyan – SCC LLFA strongly dispute this claim. No justification has been provided by the Applicant for this statement. SCC justification for disagreement provided below. Statement highlighted yellow - Concluding that infiltration is not viable based on assumed infiltration rates is strongly disputed. The 10mm/hr rate is the lowest acceptable infiltration rate and therefore, the rate that must be used to establish space requirements	Please see the Flood ***Risk and Surface Water Drainage Clarification Note*** submitted at Deadline 8 (document reference ExA.AS-13.D8.V1) for the Applicants' response to these comments. The Applicants reiterate its commitment to a primary solution of infiltration only where practicable, considering other competing land uses such as landscaping, biodiversity enhancement and access.

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	storage can be provided. However, it is important to note that this also does not meet the required half drain time.	for an infiltration only approach. This approach is necessitated due to a lack of infiltration testing by the Applicant. This approach is simply to determine space requirements. See response to paragraph 136 below for further comment on half drain time analysis. Statement highlighted red - The additional check of a 1 in 10 storm volume, following a 1 in 100 storm is again an exercise to determine space requirements. It is however an alternative methodology used to demonstrate there is sufficient storage capacity when half drain times cannot be met but a suitable infiltration rate has been achieved. Given this approach is demonstrated by the Applicant to be deliverable, it would be deemed as a design check 'pass' and is therefore not a reason to rule out infiltration. Further justification of SCC LLFA position: If infiltration were found to be achievable and viable, with an infiltration rate of 200mm/hr, for example, there would be no question that an infiltration only approach could be pursued. However, the drafting of the current OODMP and the design solution being sought by the Applicants would bypass this option in favour of discharging to the Friston Main River. This	

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		does not comply with National Planning Policy Guidance. CIRIA SuDS Manual, industry best practice for SuDS design, explicitly states the surface water disposal hierarchy, as per NPPG, before going on to state "as much of the runoff as possible (subject to technical or cost constraints) should be discharged to each destination before a lower priority destination is considered" (pg 41, CIRIA C753, 2015). The applicant is in direct conflict with this statement from best practice and has not provided any technical or cost constraint justification for this approach. Indeed, the OODMP demonstrates that an infiltration only approach is technically feasible. These points were made comprehensively by SCC LLFA at Deadline 5 (REP5-054) as part of our ISH4 posthearing submission. Specifically, section iv addressed sustainable drainage principles. This is a serious omission by the Applicant who has not sufficiently justified an approach which is contrary to national and local guidance & best practice. Neglecting to prioritise an infiltration only approach has the potential to set national precedent that could harm the water environment. The purpose of infiltrating water is to recharge the underlying aquifer. The	

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		alternative is to put the water into watercourses and send this back out to sea, where this valuable resource is lost. We urge the Applicant to change their approach and the Examining Authority to consider the potential this approach has to set national precedent if permitted.	
7	Para 7 *It is the Applicant's position therefore that the surface water drainage design at the substation location will incorporate infiltration elements, where possible, within an attenuation design with a connection to discharge at a controlled rate to the Friston Watercourse. This is in line with the drainage hierarchy and the detailed design of this system and is wholly appropriate for such nationally significant infrastructure projects. The degree to which infiltration is possible will be subject to ground investigations at the location of the onshore substations and National Grid infrastructure, land use and landscaping requirements. Percolation tests will be undertaken as part of the detailed design process to determine the underlying permeability and the feasibility of a combined infiltration / attenuation drainage design.*	Statement highlighted yellow - As per SCC LLFA response to point 6 above, we strongly dispute this approach which does not comply with national or local guidance or best practice. Despite multiple requests, the Applicant has not provided any justification for their interpretation of the drainage hierarchy which is contrary to national and local guidance and best practice. This approach is wholly inappropriate for any development, including Nationally Significant Infrastructure which has the potential for more significant impacts. Statement highlighted red - The degree to which infiltration is used should not be subject to landscaping requirements. This is a prime example of why SCC LLFA are seeking to discharge requirement 41. Statement highlighted Cyan – SCC LLFA maintain that an infiltration only approach	The Applicants note SCC's representations. Please see the ***Flood Risk and Surface Water Drainage Clarification Note*** submitted at Deadline 8 (document reference ExA.AS-13.D8.V1) for the Applicants' response to these comments. Within this document, the Applicants reiterate its commitment to a primary solution of infiltration only where practicable, considering other competing land uses such as landscaping, biodiversity enhancement and access. Integration of landscaping and the surface water management measures will prevent competing land uses from being developed in isolation and recognises the importance of proving a balance between effective landscape screening, surface water management infrastructure, and biodiversity enhancement. This approach is entirely consistent with the Suffolk Coastal Local Plan Policy SCLP9.6: Sustainable Drainage Systems, which states that

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		must be prioritised, as per SCC LLFA response to paragraph 6 above.	"Sustainable drainage systems should be integrated into the landscaping scheme and green infrastructure provision of the development; • Contribute to the design quality of the scheme; and • Deliver sufficient and appropriate water quality and aquatic biodiversity improvements, wherever possible."
8	Para 8 & 15 *The final surface water drainage design will follow the below stages:* *a) Confirm the pre-development greenfield QBAR runoff rate, calculated through detailed hydrological modelling. This will become the maximum design discharge rate to the Friston Watercourse for events up to and including a 1 in 100 year (plus 40% to account for climate change) event, and will not be exceeded postdevelopment;* *b) Confirm the pre-development infiltration rate in the area of the onshore substations and National Grid substation through percolation testing;* c) *Confirm the optimal SuDS basin(s) capacity using the above data. This*	This approach is not supported by national or local guidance and has the potential to set a national precedent which is contrary to best practice, as per SCC LLFA response to paragraph 6 above. SCC strongly challenge these stages and maintain that an infiltration only option should be prioritised, with any option utilising a positive discharge only being explored if an infiltration only option is demonstrated to be unachievable or unviable.	The Applicants note SCC's representations and have updated the ***OODMP*** at Deadline 8 (document reference ExA.AS-3.D8.V4) with amendments to Para 8 and 15 to confirm that the Applicants' will prioritise infiltration where practicable. Additionally, please see the ***Flood Risk and Surface Water Drainage Clarification Note*** submitted at Deadline 8 (document reference ExA.AS-13,D8.V1) for the Applicants' response to these comments.

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	will reflect the discharge rate to the Friston Watercourse; an appropriate infiltration rate; revisions to the substation infrastructure footprint and its detailed design; landscaping requirements; and the optimum use of land.		
9	Para 37 *The following guidance from the Construction Industry Research and Information Association (CIRIA) has informed the outline SuDS design for the onshore substations and National Grid infrastructure: • CIRIA C753 SuDS Manual (Dec 2015);*	Note that this is the document referred to in SCC LLFA's response to paragraph 6, above.	Please see the ***Flood Risk and Surface Water Drainage Clarification Note*** submitted at Deadline 8 (document reference ExA.AS-13.D8.V1) for the Applicants' response to this comment.
10	Para 37 (Removed) *The final Operational Drainage Management Plan will include a topographic survey which validates the existing conditions.*	It is unclear why the Applicant has removed this statement without replacement.	This has been reinstated within the ***OODMP*** updated at Deadline 8 (document reference ExA.AS-3.D8.V4).
11	Para 60 *There is a known (variable) risk associated with surface water flooding in proximity to the onshore substation and National Grid infrastructure, as discussed further in paragraph 63.*	Is this the correct paragraph referenced? Surface water flood risk is discussed in more detail elsewhere in the document and would seem to be a more suitable reference?	This reference has been removed in the ***OODMP*** submitted at Deadline 8 (document reference ExA.AS-3.D8.V4).
12	Para 69 *SCC indicated via email (25th September 2020) that the return period for*	This paragraph remains unchanged and is misleading, as per SCC LLFA representation	This has been updated in the ***OODMP*** submitted Deadline 8 (document reference ExA.AS-3.D8.V4).

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	this rainfall event was equivalent to approximately a 1 in 42-year event.	at Deadline 4 (REP4-064), response to REP3-046, paragraph 57 and Deadline 6 (REP6-091), response to REP5-011 ID 13.	
13	Para 75 *To confirm the validity of the above description of the existing ground conditions, as provided in the BMT report, the final ODMP will include details of the scope, extent and findings of the soil surveys (as part of the surveys described under section 3.4) which are required to validate the existing conditions.*	No surveys are described under Section 3.4.	This reference has been removed in the ***OODMP*** submitted at Deadline 8 (document reference ExA.AS-3.D8.V4).
14	Para 77 *Subsequently BMT developed a 2D model to investigate surface water runoff in the Friston catchment and the flooding to Friston in October 2019. The results of this modelling have been reviewed and considered within this OODMP and will be considered further to inform the drainage design for the onshore substations and National Grid infrastructure.*	Where have the results of BMT (2020) Friston Modelling been reviewed and considered within the OODMP? Please provide exact references. There is no assessment of the outputs. There is no assessment of how the outputs impact the proposals. The OODMP simply reiterates information provided in the BMT report.	The BMT (2020) Surface Water Management Plan Report was reviewed by the Applicants at the time of publication and further information on the underlying modelling has been included in section 3.6.1.4 of the ***OOODMP*** (document updated at Deadline 8, document reference ExA.AS-3.D8.V4). However, in summary, the review confirmed the Applicants previous conclusion, that the depths and velocities of surface water flow are minimal and therefore are classified to have a 'very low' hazard rating as per the DREFA (2006) Velocity, Depth and Flood Hazard Matrix.
15	Para 78 *The final ODMP will be produced to include details of the scope and extent of the catchment hydraulic model required to validate the existing conditions, informed by a series of surveys including, but not limited to, those described in section 3 of this document.*	No surveys are described in Section 3. Section 3.5, titled 'ground investigations' largely assess groundwater flood risk, I suspect this is an error.	This reference has been updated in the ***OODMP*** submitted at Deadline 8 (document reference ExA.AS-3.D8.V4).

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16	Para 85 *Runoff rates in Table 3.3 below are expressed using a method based on the Flood Estimation Handbook (1999) 2013 depth duration frequency (DDF) rainfall estimates (FEH 2013) produced by the UK Centre for Ecology and Hydrology. As requested by SCC, the Applicant has provided runoff rates using the FEH 2013 method as it ensures a conservative approach.*	FEH methodologies are stated as preferable in CIRIA (C753) SuDS Manual, therefore SCC welcomes this change which utilises a more conservative approach.	The Applicants welcome and note this.
17	Para 87 *Currently, there are three natural depressions at the onshore substations and National Grid substation locations (as shown in Appendix 3 and Appendix 5) which act as natural water storage basins. At this stage of the Project's initial design, the Applicant proposes that one is relocated, and that two will remain where they are currently situated. However, subject to hydrological catchment modelling it has been raised that the existing depression adjacent to the substations (as shown in Appendix 3 and Appendix 5) may no longer fulfil its function and therefore its volume has been included within the SuDS design calculations in Section 6 and Section 7. This volume has been included as a worst-case scenario and will only be accounted for if the hydrological catchment modelling shows it to be necessary.*	Whilst SCC welcome that the Applicant has sought to provide a solution to the issue identified by SCC LLFA in REP5-054, that the existing flood storage basin will be removed to facilitate the proposed access road, the proposed solution is not acceptable. The proposed relocated flood storage basin location is not acceptable to SCC LLFA as it does not serve the same extent of the catchment as the existing feature.	The Applicants would like to reiterate that the figures referred to by SCC in Appendix 4, Appendix 7 and Appendix 9 of the ***OODMP*** (REP6-017) are for indicative purposes only. The final sustainable drainage system design will take into account a site specific hydraulic catchment model and the natural topography of the site to decide where the current natural depression will be relocated to. Please see the ***Flood Risk and Surface Water Drainage Clarification Note*** submitted at Deadline 8 (document reference ExA.AS-13.D8.V1) for further response to this comment.

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18	Para 103 *The Applicant notes that the application of the SuDS hierarchy (SCC, 2018) is an iterative process, dependent on site-specific conditions which will be applied to identify an optimal drainage solution, and not wholly based on the application of a single hierarchy measure as proposed by Suffolk County Council.*	The SuDS hierarchy contained within local guidance is exactly the same as that provided in National Planning Policy Guidance. It is not an iterative process and the Applicant has provided no justification for this assertion. As per SCC LLFA's response to paragraph 6, above, this approach directly contradicts national best practice (CIRIA SuDS Manual) and has the potential to set a national precedent which could harm the wider water environment. We urge the Applicant to reconsider their approach.	The Applicants note SCC's comment and have updated the quoted wording in the ***OODMP*** submitted at Deadline 8 (document reference ExA.AS-3.D8.V4). Additionally, please see the ***Flood Risk and Surface Water Drainage Clarification Note*** submitted at Deadline 8 (document reference ExA.AS-13.D8.V1) for the Applicants' further responses to this comment.
19	Para 105 *In accordance with the SuDS hierarchy, the Applicant presents an assessment of the viability of an infiltration only design in section 6 with a subsequent assessment of an attenuation only design in section 7. The final details related to the application of the SuDS hierarchy will be determined during detailed design.*	Presenting an assessment of an infiltration only approach cannot be deemed as compliance with the surface water hierarchy when the rest of the OODMP seeks to prioritise a discharge to the Friston Main River.	The Applicants note SCC's comment and have updated the ***OODMP*** submitted at Deadline 8 (document reference ExA.AS-3.D8.V4). Additionally, please see the ***Flood Risk and Surface Water Drainage Clarification Note*** submitted at Deadline 8 (document reference ExA.AS-13.D8.V1) for the Applicants' further responses to this comment.
20	Para 108 *Drainage during the construction phase will be subject to a separate construction phase surface water and drainage management plan to be produced post consent under Requirement 22(2)(a) of the draft DCO (REP5-003).*	Despite repeated requests in SCC LLFA's written submissions to the Examining Authority, the Applicant has still not attempted to provide details that demonstrate surface water drainage mitigation identified as necessary in the Environmental Statement can be accommodated within the Order Limits during construction.	As stated in the ***OODMP*** (REP6-017) submitted at Deadline 6 (and also in the version submitted ta Deadline 8), a separate surface water and drainage management plan will be produced post consent, as secured under Requirement 22 of the ***draft DCO*** (document updated at Deadline 8, document reference 3.1).

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21	Para 110 *When considering pre and post development surface water drainage the Applicant commits to the following:* • *There will be no increase in the existing predevelopment greenfield runoff rates to the receiving Friston Watercourse catchment;* • *Any reduction or removal of existing storage depressions, if required, will be offset and accommodated within the final SuDS design; and* • *Existing watercourses and flow routes will be appropriately managed to ensure continued conveyance around the northern perimeter of the National Grid substation site.*	The Applicant must commit to prioritising infiltration, as per the surface water disposal hierarchy, discussed in SCC LLFA's response to paragraph 6, above.	The Applicants note this and have updated the ***OODMP*** submitted at Deadline 8 (document reference ExA.AS-3.D8.V4) accordingly. The ***OODMP*** submitted at Deadline 8 (ExA.AS-3.D8.V4) reiterates the Applicants commitment to a primary solution of infiltration where practicable. Additionally, please see the ***Flood Risk and Surface Water Drainage Clarification Note*** submitted at Deadline 8 (document reference ExA.AS-13.D8.V1) for further responses to this comment.
22	Para 114 *Should there be a need for the permanent substation operational access road to be located over an existing surface water flood storage basin, either it will be relocated to an alternative suitable location (as shown in Appendix 3 and Appendix 5) or the existing volume reduction will be offset and accommodated within the final SuDS design.*	The existing natural depression providing est 222m3 (from Drawing No. ED11892-C-SK10-G in Appendix 3) cannot be moved to the proposed location. The proposed location is served by a different extent of the hydraulic catchment and would therefore not be a like for like replacement of the existing flood storage area.	The Applicants would like to reiterate that the figures referred to by SCC in Appendix 3 and Appendix 5 of the ***OODMP*** (REP6-017) are for indicative purposes only. The final infiltration / SuDS design will take into account a site specific hydraulic catchment model and the natural topography of the site to determine where the current natural depression will be relocated to. Please see the ***Flood Risk and Surface Water Drainage Clarification Note*** submitted at Deadline 8

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		This volume cannot be accommodated in the final SuDS design as this could result in greater volumes of water entering the basins than needs to be offset which could exceed the capacity of any proposed basin.	(document reference ExA.AS-13.D8.V4) for further response to this comment.
23	Para 119 & 120 119 - *A new outfall pipe will be installed to manage runoff from the onshore substations and National Grid infrastructure to the existing Friston Watercourse in the vicinity of Church Lane.* 120 - *It will be necessary to connect this pipe into the Friston Watercourse via a new connection and associated underground structure.*	The feasibility of a piped connection to the Friston Main River must be considered before it can be determined as a feasible solution to managing surface water. If it is not possible to achieve an engineered connection to the Friston Main River due to the shallow depth of the Main River and the necessity for any culvert to pass under Church Road, Friston, with sufficient pipe cover, this must be a material consideration. Discussion with the Highway Authority has confirmed they also have concerns about the feasibility of this connection.	The Applicants notes this and have updated the ***OODMP*** submitted at Deadline 8 (ExA.AS-3.D8.V4) accordingly.
24	Para 136 *The Applicant notes SCC's comments at Deadline 3 (REP3-101) and Deadline 4 (REP4-064) regarding the need for an infiltration only design to achieve a half drain time of 24 hours under a 1 in 100 year plus 40% for climate change scenario. As shown in Appendix 2, when applying a Factor of Safety (FoS) of 10 to the parameters detailed in section 6.2, the drainage time is in exceedance of 7 days and therefore does not meet SCC's specification for an infiltration*	When a suitable infiltration rate has been achieved but a half drain times of 24 hours cannot be met for 1 in 100 + CC, an alternative approach is to ensure there is sufficient storage provided for a follow up storm of 1 in 10 + CC. If sufficient storage is provided for the 1 in 100 + CC storm, followed by a 1 in 10 + CC storm after 24 hours, as has been demonstrated in this submission, this would be deemed as a design check 'pass'.	The Applicants note this additional approach and have undertaken this secondary assessment within the ***OODMP*** (REP6-017), however concluded that this also did not meet the required half drain time of 24 hours. Please see the ***Flood Risk and Surface Water Drainage Clarification Note*** submitted at Deadline 8 (document reference ExA.AS-13.D8.V1) for further responses to this comment.

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	only design. Preconstruction ground investigations including infiltration testing will be conducted in order to determine whether the baseline infiltration rate is greater than 10mm/hr. This will inform the extent to which infiltration measures can be prioritised and incorporated into the final SuDS design as appropriate.		
25	Para 139 *It is considered unlikely that based on the 10mm/hr infiltration rate that the design could be developed to meet both the 24 hour half drain time and deliver other elements of the Project design including landscaping requirements and optimal use of the land. Therefore, an infiltration only scheme is demonstrated to be unviable due to neither assessment criteria achieving a 24 hour half drain time.*	It is misleading to draw this conclusion based on indicative worst acceptable design criteria, as per SCC LLFA response to paragraph 6, above. Half drain time criteria has been met, as per SCC LLFA response to paragraph 136, above. Statement highlighted yellow – This statement suggests that the Applicant is not willing to pursue an infiltration only option, that is demonstrated in this document as deliverable within the Order Limits, due to the impact on other design elements (such as landscape). As a result, the Applicant is seeking to utilise a sub-optimal solution, of discharging to Friston Main River. The national precedent this could set is discussed in SCC LLFA's response to paragraph 6, above. Again, this further justifies SCC LLFA's position that it should be the discharging authority for	The Applicants note SCC's comments on this quote, and it has been removed in the updated the ***OODMP*** submitted at Deadline 8 (document reference ExA.AS-3.D8.V4) accordingly. Please see the ***Flood Risk and Surface Water Drainage Clarification Note*** submitted at Deadline 8 (document reference ExA.AS-13.D8.V1) for the Applicants' response to these comments.

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		Requirement 41, to ensure that an optimal surface water drainage strategy is achieved, in compliance with national and local policy and guidance.	
26	Para 140 *Unless the hydrological catchment modelling and the percolation tests, which will be undertaken post consent, conclude that an infiltration only design is feasible, this OODMP concludes that this is not a feasible solution.*	It is assumed this conclusion is based on the section highlighted yellow, above, from Paragraph 139. This is despite the fact an infiltration only solution is demonstrated as achievable within the Order Limits and calculations are provided to pass half drain design checks, as per SCC LLFA response to paragraph 136, above.	Please see the ***Flood Risk and Surface Water Drainage Clarification Note*** submitted at Deadline 8 (document reference ExA.AS-13.D8.V1) for the Applicants' response to this comment.
27	Para 144 *As shown in Table 7.2, the estimated storage requirements for an infiltration only scheme is larger than the storage required for an attenuation only scheme. Appendix 4 provides detailed calculations of the above figures and Appendix 5 shows an indicative layout of the attenuation basins.*	Statement highlighted yellow - If an infiltration only scheme was pursued, it is hoped that an infiltration rate greater than 10mm/hr (the worst acceptable) would be achieved, thus reducing storage requirements. Likewise, if infiltration is deemed unachievable or unviable, the detailed hydraulic model that the Applicant will develop as part of detailed design (as per para 150 & 151) could result in reduced discharge rates to the Friston Main River, increasing attenuation storage requirements. The statement made by the Applicant is therefore, irrelevant.	The Applicants do not deem the comment made in paragraph 144 of the ***OODMP*** (REP6-017) irrelevant. Please see the ***Flood Risk and Surface Water Drainage Clarification Note*** submitted at Deadline 8 (document reference ExA.AS-13.D8.V1) for the Applicants' response to this comment.
28	Para 152 *Table 7.3 and Table 7.4 demonstrate that larger storage basins can be accommodated within the Order limits and in*	The sensitivity tests contained within Tables 7.3 & 7.4 are acceptable.	The Applicants consider that sensitivity tests are not applicable to an infiltration only option.

ID	SPR Statement	SCC Comment	Applicants' Comments
	conjunction with the Outline Landscape and Ecological Management Strategy (updated version submitted at Deadline 6, document reference 8.7), should this be required.	SCC LLFA enquire why a similar sensitivity test has not been undertaken for an infiltration only option? The Applicant has been keen to rule out an infiltration only approach, due to potential impacts identified in paragraph 139 of this document and explained further in Applicants' Comments on SCC's Deadline 5 Submissions (REP6- 027) ID 5. Whilst SCC LLFA maintain that an infiltration only solution should be pursued if proven to be achievable and viable, if this negatively influences the mitigation measures for other impacts, this needs to be clearly identified with supporting evidence (i.e., plans). If this is the case, the Applicant should explore options to relocate mitigation options (drainage, landscape or otherwise), to still achieve optimal mitigation. If this is proven not to be possible (with supporting evidence) a logical subsequent step would be for the Applicant to then determine at what point an infiltration only approach would not negatively influence the mitigation of other impacts. This could be presented as a 'threshold infiltration rate' at which point an infiltration only option could be achieved, without negatively influencing the mitigation of other impacts. If an infiltration rate were achieved between 10mm/hr and any identified threshold, a hybrid solution could be presented, with a restricted overflow	Please see the ***Flood Risk and Surface Water Drainage Clarification Note*** submitted at Deadline 8 (document reference ExA.AS-13.D8.V1) for the Applicants' response to these comments.

ID	SPR Statement	SCC Comment	Applicants' Comments
		to the Friston Main River in extreme rainfall events only. This potential approach could put options in front of the Examining Authority and Secretary of State, to consider as part of the planning balance, alongside options to relocate mitigation, rather than the approach the Applicant is currently taking, which seeks to rule out infiltration only based on indicative infiltration rates. SCC LLFA maintain that an infiltration only option should be pursued if infiltration is found to be achievable (≥10mm/hr) and viable. The development should have considered space requirements for SuDS as part of feasibility design, alongside the incorporation of other mitigation measures. The Applicant should seek to utilise additional space for SuDS elsewhere within the Order Limits if unacceptable impacts on other mitigation is identified.	
29	Para 161 *As discussed in Section 6, although an infiltration only scheme is currently proving unviable due to the infiltration rate assumed, infiltration will be incorporated into the final drainage scheme as far as practicably possible. As outlined in Section 7, although an attenuation only scheme is viable, it is not the Applicant's position that an attenuation only scheme will be adopted. Instead, the*	Statement highlighted yellow – See SCC LLFA response to paragraph 6, above. Also, as per SCC LLFA response to paragraph 152, above. Rather than rule out infiltration based on worst-case scenario design assumptions, SCC LLFA would like to see the Applicant undertake sensitivity testing to determine what they deem to be an achievable	The Applicants note this and have updated the ***OODMP*** submitted at Deadline 8 (document reference ExA.AS-3.D8.V4) to prioritise infiltration, where practicable. Additionally, please see the ***Flood Risk and Surface Water Drainage Clarification Note*** submitted at Deadline 8 (document reference ExA.AS-13.D8.V1) for further responses to this comment.

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	Applicant looks to implement a hybrid scheme which incorporates both, in line with the SCC hierarchy, whilst committing to limiting the outfall discharge rates to that of the pre-development greenfield runoff rate. This connection to the surface water body (i.e. Friston Watercourse) additionally allows for design flexibility which will be influenced by pre-construction infiltration testing, detailed design of the onshore substations, National Grid infrastructure and the operational surface water drainage system itself.	infiltration rate, rather than ruling out infiltration only from the outset. Statement highlighted red – See SCC LLFA response to paragraph 6, above.	
30	Plate 9.1	This diagram does not allow for an infiltration only design, contrary to national and local guidance and best practice, as per SCC LLFA response to paragraph 6, above	The Applicants note this and have updated Plate 9.1 within the ***OODMP*** submitted at Deadline 8 (document reference ExA.AS-3.D8.V4) accordingly. Additionally, please see the ***Flood Risk and Surface Water Drainage Clarification Note*** submitted at Deadline 8 (document reference ExA.AS-13.D8.V1) for the Applicants' further responses to this comment. .
31	References	Given the considerable discussion on the surface water disposal hierarchy it is noted that no reference is made here to the National Planning Policy Guidance, which sets out the surface water disposal hierarchy.	The Applicants note this and have updated the references in the ***OODMP*** submitted at Deadline 8 (document reference ExA.AS-3.D8.V4) accordingly.
32	SuDS Infiltration Design Calculations	Design top area is stated as 1m deep, freeboard top area is stated as 1.3m deep. However, Design storage depth is listed as	The indicative basin design provided in the ***OODMP*** at Deadline 6 (REP6-017) is 1.3m deep, however it has been designed so that the full depth is not utilised in

ID	SPR Statement	SCC Comment	Applicants' Comments
		0.7m with design freeboard + 0.3m (1.0m deep). These two statements are contradictory, which has been used for the calculations? 1 in 100 + CC + 1 in 10 + CC water depths for each basin, based on calculations are; SPR substation = 0.858m NG substation = 0.99m This complies with national and local guidance and best practice. This does not match the water depths annotated on the drawing in Appendix 3, SCC assume these need to be corrected to mirror the calculations provided?	the rain events modelled. These parameters were chosen to maximise infiltration rates and therefore reduce the half drain times. This additional volume is also beneficial to have as a further buffer. The basin size could technically be reduced, but that would lead to a longer half drain time. As stated above, the drawings and figures provided within the ***OODMP*** at Deadline 6 (REP6-016) are indicative and for demonstration purposes only. The final sizes and depths of the basins will be confirmed during detailed design.
33	Appendix 3, Drawing No. ED11892-C-SK10-G	Existing natural depression providing est 222m3 cannot be moved to proposed location. The proposed location is served by a different extent of the hydraulic catchment and would therefore not be a like for like replacement of the existing flood storage area.	The Applicants would like to stress that the figures referred to by SCC in Appendix 3 and Appendix 5 of the ***OODMP*** (REP6-017) are for indicative purposes only. The final infiltration / SuDS design will take into account a site specific hydraulic catchment model and the natural topography of the site to decide where the current natural depression will be relocated to. Please see the ***Flood Risk and Surface Water Drainage Clarification Note*** submitted at Deadline 8 (document reference ExA.AS-13.D8.V1) for further responses to this comment.
34	Appendix 4	Calculations meet national and local design guidance and best practice	The Applicants welcome and note this.

ID	SPR Statement	SCC Comment	Applicants' Comments
Applicants' Comments on SCC's Deadline 5 Submissions [REP6-027]			
35	The Applicants can confirm that in accordance with the representation from SCC at Deadline 5 (REP5-054), the SuDS Infiltration Note (REP4-044) has been incorporated into the Outline Operational Drainage Management Plan (ExA.AS-1.D6.V3), which has been submitted at Deadline 6. Within this document, for the infiltration only approach the storage required for an additional 1:10 storm event 24 hours after a 1:100 storm event has been calculated and presented. As described in the Outline Operational Drainage Management Plan (ExA.AS-1.D6.V3), which has been submitted at Deadline 6, the Applicants have calculated an infiltration only scheme to be unviable with the current infiltration rate applied – 10mm/hr – as per SCC guidance. Additionally, the Applicants would like to highlight that an infiltration only scheme will require larger SuDS basins which will subsequently affect factors such as ecology and landscaping. Preconstruction ground investigations will be undertaken during detailed design to determine whether the baseline infiltration rate is greater than 10mm/hr. This will inform the extent to which infiltration measures can	SCC LLFA welcome the incorporation of the SuDS Infiltration Note within the Outline Operational Drainage Management Plan. Statement highlighted yellow – See section 2.2 of this document, which responds to the Applicants' submission of a revised Outline Operational Drainage Management Plan (REP6-017) at Deadline 6. Specifically, response to paragraph 6 addresses this issue. Statement highlighted red - See section 2.2 of this document, which responds to the Applicants' submission of a revised Outline Operational Drainage Management Plan at Deadline 6. Specifically, response to paragraphs 139 & 152 addresses this issue.	The Applicants note that SCC welcomes this. The Applicants do not deem either of the statements made within REP6-027 unreasonable or incorrect. Please see the ***Flood Risk and Surface Water Drainage Clarification Note*** submitted at Deadline 8 (document reference ExA.AS-13.D8.V1) for further responses to these comments.

ID	SPR Statement	SCC Comment	Applicants' Comments
	be promoted and incorporated into the final SuDS design.		
36	The Applicants accept the surface water disposal hierarchy and are not implying that a different standard should be set for national infrastructure projects. However, the Applicants deem an infiltration only scheme likely to be inappropriate for the onshore substations and National Grid infrastructure site for two reasons: 1) Applying the current infiltration rate, an infiltration only scheme will require the SuDS basins to be increased to a size that will subsequently affect other factors such as ecology and landscaping. 2) A commitment has been made to not increase the Mean Maximum Flow Rate (QBAR) rate above pre-development levels, meaning if a hybrid scheme is adopted, the receiving watercourse will not be impacted. The Applicants appropriately apply the surface water disposal hierarchy within the updated Outline Operational Drainage Management Plan (ExA.AS-1.D6.V3).	Statement highlighted yellow - See section 2.2 of this document, which responds to the Applicants' submission of a revised Outline Operational Drainage Management Plan at Deadline 6. Specifically, responses to paragraphs 139 & 152 address this issue. Statement highlighted red – This is incorrect and justification for SCC LLFA's position was provided at Deadline 5 as part of our post hearing submission to ISH4 Agenda item 4.d.iv. This is covered again in section 2.2 of this document, which responds to the Applicants' submission of a revised Outline Operational Drainage Management Plan at Deadline 6. Specifically, response to paragraph 6 addresses this issue, including reference to CIRIA SuDS Manual, which is considered industry best practice and with which the Applicants are in direct contradiction. This direct conflict between surface water drainage infrastructure and landscape justifies SCC's position in requesting to be the discharging authority for Requirement 41.	The Applicants have updated the ***OODMP*** at Deadline 8 (ExA.AS-3.D8.V4) to reflect these comments. Additionally, please see the ***Flood Risk and Surface Water Drainage Clarification Note*** submitted at Deadline 8 (document reference ExA.AS-13.D8.V1) for further responses to these comments.

ID	SPR Statement	SCC Comment	Applicants' Comments
37	Updated infiltration figures have been appended to the Outline Operational Drainage Management Plan (ExA.AS1.D6.V3), which has been submitted at Deadline 6. These figures demonstrate that an appropriate 300mm industry standard freeboard has been adopted within the updated design. When the Applicants undertake ground investigations and the detailed design process specifics such as the location of connection points and their feasibility will be confirmed.	Statement highlighted yellow – Surely the feasibility of a connection to the Friston Main River must be considered before it can be determined as a feasible solution to managing surface water? If it is not possible to achieve an engineered connection to the Friston Main River due to the shallow depth of the Main River and the necessity for any culvert to pass under Church Road Friston, this must be a material consideration.	The Applicants have provided an updated ***OODMP*** at Deadline 8 (ExA.AS-3.D8.V4) to reflect this comment. Additionally, please see the ***Flood Risk and Surface Water Drainage Clarification Note*** submitted at Deadline 8 (document reference ExA.AS-13.D8.V1) for further responses to this comment.
38	The Applicants welcome SCC's view that discharge to Friston Main River must be included in the design options. The Applicants disagree that discharge to Friston Main River should be a secondary option because the Applicants have committed to ensuring that the predevelopment QBAR rate is not exceeded post development. Within the updated Outline Operational Drainage Management Plan (ExA.AS-1.D6.V3), which has been submitted at Deadline 6, the Applicants demonstrate an understanding of and compliance with the surface water disposal hierarchy. The Applicants acknowledge that infiltration is the first hierarchy measure to consider and propose to	Statement highlighted yellow – This is not justification for failure to comply with the surface water disposal hierarchy, contained within the National Planning Policy Guidance and discussed further in section 2.2 of this document, which responds to the Applicants submission of a revised Outline Operational Drainage Management Plan at Deadline 6. Specifically, response to paragraph 6 addresses this issue, including reference to CIRIA SuDS Manual, which is considered industry best practice and with which the Applicants are in direct contradiction. Statement highlighted red – The OODMP should consider infiltration only as option 1.	The Applicants have provided an updated ***OODMP*** at Deadline 8 (ExA.AS-3.D8.V4) that reflects these comments. Additionally, please see the ***Flood Risk and Surface Water Drainage Clarification Note*** submitted at Deadline 8 (document reference ExA.AS-13.D8.V1) for further responses to these comments.

ID	SPR Statement	SCC Comment	Applicants' Comments
	design a surface water management scheme which incorporates infiltration. However, attenuation and subsequent discharge to the Friston watercourse is also accounted for as the Applicants note there are other constraints to the design, including ecology and landscaping, and that appropriate infiltration rates have yet to be determined. The Applicants are committed to ensuring that discharge from the proposed development would be limited to the pre-development QBAR rate up to and including the 1:100 year plus 40% climate change event.	Attenuation and discharge should be considered as option 2. The potential negative influence of an infiltration only option on mitigation measures required for other identified impacts is discussed further in section 2.2 of this document, which responds to the Applicants' submission of a revised Outline Operational Drainage Management Plan at Deadline 6. Specifically, response to paragraph 152.	
39	The Applicants refer to the response provided at Deadline 4 (REP4-025) whereby there is a commitment to the application of industry best practice. The Applicants acknowledge that the risk associated with surface water flooding is relevant both during construction and operation. Flood risk in the longer term (i.e. during operation) has been set out in the updated Outline Operational Drainage Management Plan (ExA.AS-1.D6.V3), which has been submitted at Deadline 6. The Applicants note that there are a number of factors that will determine the mitigation options available during the construction phase. These will be defined at detailed design and include infiltration rates, final	Whilst the points made by the Applicant are noted, this does not progress the matter any further. The Applicant has still not demonstrated that mitigation measures can be implemented within the Order Limits during construction to mitigate the potential increase in off-site flood risk identified in the Environmental Assessment.	The Applicants have submitted an updated ***Outline Code of Construction Practice*** at Deadline 8 (document reference 8.1) and a ***Flood Risk and Surface Water Drainage Clarification Note*** submitted at Deadline 8 (document reference ExA.AS-13.D8.V1) to respond to this comment.

ID	SPR Statement	SCC Comment	Applicants' Comments
	layout, proposed construction method and construction phasing / programming. All of these factors will determine the appropriate surface water drainage mitigation to be implemented and as such will be addressed in the Construction Method Statement to be secured under Requirement 22(2)(h) of the draft DCO (REP3-011) which must be submitted to the relevant planning authority for approval prior to construction as well as within a construction phase surface water and drainage management plan will also be submitted for approval as part of the final CoCP in accordance with Requirement 22(2)(a).		
40	The Applicants acknowledge that the infiltration rate adopted is a worst case scenario and commits to infiltration / percolation tests to establish the actual infiltration rate post consent. Pre-construction ground investigation and infiltration testing will determine the extent to which infiltration components can be incorporated into the final SuDS design. The Applicants do not deem it appropriate to undertake infiltration tests at this stage and consider it unusual for nationally significant infrastructure projects to do so. The secondary assessment of a 1:10 year storm event 24 hours after a 1:100 year	With reference to ID 5 of this response, all developments in Suffolk are expected to submit infiltration testing results with any planning application, as per the table provided in Section 3 of Appendix A to the Suffolk Flood Risk Management Strategy. Furthermore, this approach is not at all unusual for NSIPs. This is discussed further in section 2.2 of this document, which responds to the Applicants' submission of a revised Outline Operational Drainage Management Plan at Deadline 6, specifically SCC LLFA's response to paragraph 1.	Please see response at ID4 of this table. Please see the ***Flood Risk and Surface Water Drainage Clarification Note*** submitted at Deadline 8 (document reference ExA.AS-13.D8.V1) for further responses to these comments.

ID	SPR Statement	SCC Comment	Applicants' Comments
	storm event (both incorporating an allowance of 40% for climate change) has been undertaken and presented in the updated Outline Operational Drainage Management Plan (ExA.AS-1.D6.V3) which has been submitted at Deadline 6.	Nonetheless, the lack of infiltration testing has facilitated the need to work with worst-case acceptable infiltration rates, hence the worst-case scenario infiltration only design, which is a consequence of the lack of infiltration testing. This is entirely the Applicants' choice but further justifies why it would be illogical to rule out infiltration only based on an approach required due to the Applicants' own decisions which required this approach.	
41	The Applicants note that there are a number of factors that will determine the surface water drainage options available during the construction phase, such as ground permeability, proximity of existing drainage channels/pits. These will be defined at detailed design, including infiltration rates, final layout, proposed construction method and construction phasing / programming. The concept design for the Projects differ from East Anglia ONE in that the Applicant has allowed for temporary SuDS within the onshore cable route by the relocation of sections of soil stockpiles. All of these factors will determine the appropriate surface water drainage mitigation to be implemented and as such will be addressed in the construction phase surface water and drainage management plan which must be submitted	Whilst the points made by the Applicant are noted, this does not progress the matter any further. The Applicant has still not demonstrated that mitigation measures can be implemented within the Order Limits during construction to mitigate the potential increase in off-site flood risk identified in the Environmental Assessment.	The Applicants have submitted an updated ***Outline Code of Construction Practice*** at Deadline 8 (document reference 8.1) and a ***Flood Risk and Surface Water Drainage Clarification Note*** submitted at Deadline 8 (document reference ExA.AS-13.D8.V1) to respond to this comment.

ID	SPR Statement	SCC Comment	Applicants' Comments
	for approval as part of the final CoCP in accordance with Requirement 22(2)(a).		

2.3 Comments on Suffolk County Council as Local Highways Authority

ID	SCC Comment	Applicants' Comments
Comments on Applicants; Response to ExQ2 Volume 8 2.18 Transport and Traffic		
1	**2,18.1** b) to clarify the LHA position it is the Applicant that concluded an average speed camera met the stated objectives and provided the best solution for an enhanced road safety scheme. The LHA did not concur with the effectiveness of speed cameras as the majority of collisions involve drivers turning right onto the A1094 and not controlled by such a measure.	Noted.
2	**2.18.2** The LHA is of the opinion that the main impact of the project at the A12/A1094 was the increased risk to the safety of road users and this was of higher importance than highway capacity. Notwithstanding this the LHA is satisfied that the impact on highway capacity is acceptable (REP5-055). The LHA notes that there appears to be incomplete text in the penultimate paragraph of the Applicant's response when referring to the OCTMP.	Noted. The incomplete sentence should read: *"The* **Outline Construction Traffic Management Plan** *(OCTMP) submitted at Deadline 6 (REP6-009) contains a commitment to monitor and report accidents and 'near-misses' on the delivery routes…."*
3	**2.18.3** The LHA has provided a copy of the Authority's generic s278 agreement for their consideration.	The Applicants have agreed a draft S278 agreement in consultation with SCC (document reference ExA.AS-37.D8.V1). The A12/A1094 Friday Street scheme is secured by the ***Outline Construction Traffic Management Plan*** (OCTMP) (document reference 8.9) and the provisions of Requirement 28, (and will be permitted by the S278 agreement).
4	**2.18.4** Within the s278 agreement the LHA require road safety audits to be completed. While this agreement is primarily for delivery of permanent highway infrastructure the potential for this temporary measure to remain in place for a number of years means that the LHA will require safety audits. This is commensurate with the Applicants	Please refer to Applicants' response to ID3.

ID	SCC Comment	Applicants' Comments
	commitment in paragraph 103 of the OCTMP. If traffic speeds are a concern the s278 agreement would be a mechanism by which the Applicant can be required to undertake surveys or remedial measures to control speeds If applicable.	
5	**2.18.5** The LHA would make two comments on the Applicants response to AIL movements. Firstly, if additional sub stations are permitted in the Friston area AIL movements may not be infrequent. It cannot be assured that any other substation transformers will be 'designed not to fail' (cf Applicant's response at 2.18.9(a)) or that any other equipment will be sized so as not to entail a need for AIL movements. Secondly, the LHA is already aware of a planning application that will impact on the proposed route (Application DC/20/5181/OUT) https://publicaccess.eastsuffolk.gov.uk/onlineapplications/applicationDetails.do?keyVal=QLJLNMQXGSW00&activeTab= summary) This application is based on an extant 2016 permission that included traffic islands to enable pedestrians from the development to safely cross Abbey Road. Acknowledging that this may reduce the lane widths and hence affect restrict future AIL movements it may be necessary to use measures such as removable islands to enable wide loads movements in the future although there will be cost implications for both the applicant and the developer. The LHA considers that the matter should be brought to both the LPAs attention for this development and the ExA to demonstrate the risks posed to use of this route to the substation.	It is inappropriate for the Applicants to consider whether other projects require Abnormal Indivisible Load (AIL) movements given no other project has a confirmed connection at the Friston substation and no project is sufficiently defined. In the event of any extension of the National Grid Substation, no AIL movements would be anticipated 9as no AIL movements are required for the National Grid Substation proposed under the Applicants' Projects. The Applicants note that two central islands are proposed on Abbey Road to the north of Leiston associated with a new (unrelated) development (DC/20/5181/OUT). It is understood that the final design of the islands is not progressed, but that the islands are required to assist pedestrians in safely crossing the road. Central islands are not an uncommon feature along the public highway and can be negotiated by AIL. This typically involves, any street furniture (such as signs or railings) first being dismounted and then the kerbed island being over-sailed by the AIL. It is noted that the AIL trailers can be raised and lowered on route by approximately 1m. It is noted that the existing Heavy Route 100 (HR100) from Lowestoft to Leiston encompasses numerous central islands and splitter islands that AIL would need to negotiate. ***Appendix 26.3*** of the ES (APP-529) identifies these features and proposes mitigation.
6	**2.18.6** The LHA comments on cumulative impact assessment are included in the response (below) to Clarification Note 'Sizewell Projects	Noted.

ID	SCC Comment	Applicants' Comments
	Cumulative Impact Assessment (Traffic and Transport)' submitted by the Applicants at Deadline 6 of the Examination.	
7	**2.18.8c** The HR100 heavy loads route does not have any protection in terms of legislation and only limited protection through the DoT Roads Circular 61/72 (https://webarchive.nationalarchives.gov.uk/20100303222626/http://www.dft.gov.uk/pgr/roads/tpm/tal/circulars/ular6172routesforheavyan4064.pdf) which does not extend to the route south of Lovers Lane . HR100 remains a 'preferred 'route. In terms of new routes, the DfT advice is If you have a suggestion for a new route, or a change to a route, to be considered for the high and heavy loads grid please contact Highways England's abnormal loads team. Newly suggested routes will need to be equal to or greater than the specifications of the existing routes. The suggestions must also be to or from locations with a critical need to move loads of this nature or be on regularly used routes. https://www.gov.uk/government/publications/preferred-routes-for-high-andheavy-abnormal-load-movements Until such time as there is certainty regarding the use of the Friston area for sub-stations the LHA is not in a position to determine if this route is either critical or likely to be used regularly.	Heavy Routes (known as grids) and the Department for Transport Circular 61/72 were a direct response to a recommendation from the Ports Council to secure routes that were subject to frequent AIL use. The Projects are not going to generate the quantum of AIL movements during construction or operation to qualify as frequent use, in the way a large Port development might. A developer is not precluded from utilising alternative (non-grid) routes and it is not uncommon to use non grid routes (providing the water preferred policy is satisfied[1]). Accordingly, the Applicants commissioned heavy haul experts Wynns to undertake an assessment of the movement of the Projects' transformers. A preferred route is established, being Lowestoft to Leiston (HR 100) with the final leg via the B1122, B1069, A1090 and B1121. A contingency route is established, being Felixstowe to Leiston via Yoxford (A14, A12) and the same final leg as the Lowestoft origin. The 'Wynns report' presents a series of constraints along the routes and sets out mitigation to demonstrate both preferred and contingency routes are viable. A Special Order AIL movement is permitted through an application to Highways England known as ESDAL (Electronic Service for Delivery for Abnormal Loads). Highway England advise that to ensure that the necessary clearances can be obtained in good time from the Police, Highway and Bridge Authorities, permission for the move should be requested 10 weeks prior to the scheduled date of the move, approval is at the discretion of the Highways England.

[1] Guidelines for the movement of abnormal invisible loads (2019) directs "nearest coastal port" to minimise the distance AILs are tranferred by road.

ID	SCC Comment	Applicants' Comments
		The ***OCTMP***, Paragraph 62 (document updated at Deadline 8, document reference 8.9) secures a commitment to the ESDAL approval process.
8	**2.18.12** It is usual for the 'Stop Works' method of traffic management to be used for street works rather than to control traffic for the movement of large loads. The LHA is reviewing its position on this method. If the applicant has examples where this method has been used and accepted by the police and LHA this would be appreciated.	The conditions for the use of the Stop-Works sign is prescribed in the Department for Transport publication, Traffic signs manual chapter 8 (part 1) road works and temporary situations - design (2009). Chapter 8 states that: *"The 'STOP-WORKS' sign to diagram 7031 may be used only to stop traffic for a short period during works on or near a road, or during a temporary obstruction of a road. Two 'STOP-WORKS' signs may be required in circumstances such as manoeuvring plant or works vehicles."* The Applicants conclude that the application of Stop-Works is entirely correct to manage large heavy goods vehicles (HGV) exiting north at the at the A1094 Aldeburgh roundabout.
9	**2.18.14** The LHA would concur with the Applicant that routing traffic via the B1122 and B1069 via Leiston would impact more residential areas than the A1094 route. While the proposed Sizewell Link Road may reduce the impacts on Yoxford, Middleton and Theberton the route would still pass through Leiston and Knodishall.	Noted.
10	**2.18.15** The LHA notes that similar crossings to that proposed on the B1353 were used during construction of EA1 without any known problems.	Noted.
11	**2.18.16** The LHA notes that bullet point three should read direct access from Sizewell Gap at access 2 not from Snape Road at access 2. Due to the constrained site at access 3 and 4 the LHA would agree that entry / exit movements at this point should be kept to a minimum.	Noted

ID	SCC Comment	Applicants' Comments
12	**2.18.17** The LHA welcomes the additional information regarding the measures that may be necessary to allow heavy loads to cross Marlesford Bridge. Although the Authority accepts the procedure in principle the Applicant will need to provide details of how such measures will be implemented without creating delays to traffic using the A12. The Authority would not consider that traffic restrictions, closures or diversions during the day would be acceptable.	The OCTMP (document updated at Deadline 8, document reference 8.9) secures a commitment to the ESDAL approval process for applying for Special Order Movements (see Applicants' response to ID7). The ESDAL process ensures that permission for a Special Order AIL movement is not granted by Highways England until the Applicants have satisfied the requirements of the highway and bridge authorities. The Applicants have retained heavy haul experts Wynns to evaluate the process for securing AIL access over the Marlesford Bridge. They advise, noting that the bridge span is 6.1m, the most likely structural intervention (if required) would be a temporary steel bridge placed over the existing bridge deck. There is potential for this intervention to be implemented under single lane closure, for a period of two days, to avoid the requirement to divert traffic. This intervention can be implemented to avoid the daytime traffic sensitive time restrictions defined by SCC.
Sizewell C Cumulative Impact Assessment Note (Traffic and Transport) [REP6-043]		
13	This section forms the Local Highways Authority's (LHA) response to the Clarification Note 'Sizewell Projects Cumulative Impact Assessment (Traffic and Transport)' submitted by the Applicants at Deadline 6 of the Examination located here:https://infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/uploads/projects/EN010077/EN010077-004035-ExA.AS6.D6.V2%20EA1N&EA2%20Sizewell%20C%20Cumulative%20Impact%20Assessment%20Note%20(Traffic%20and%20Transport).pdf. These comments form a response to matters relating to the Cumulative Impact Assessment (CIA) of 'Traffic and Transport' only and does not	The submission of a revised Sizewell C (SZC) transport strategy to the Planning Inspectorate (SZC Examination reference number AS-266) has necessitated a review of the cumulative impacts. To inform this review the Applicants have engaged with SCC to find common ground on the cumulative assessment and understand the consequences for a revised SZC transport strategy. The Applicants have agreed to undertake pedestrian amenity mitigation at Link 2 (the A12 through Yoxford) and Link 3 (the A12 through Marlesford), in the form of footway improvements proportionate to the Projects'

ID	SCC Comment	Applicants' Comments
	provide comments on areas impacted by 'Traffic and Transport' such as air quality, and noise and vibration, which form part of other workstreams.	contribution to the cumulative impact. These improvements would not conflict with future schemes proposed by SZC or SCC. An updated ***Sizewell C Cumulative Impact Assessment Note (Traffic and Transport)*** (REP6-043) has been submitted to the examination at Deadline 6. SCC are now satisfied that the cumulative impacts with Sizewell C have been identified and suitable mitigation included within the ***OCTMP*** (document reference 8.9).
14	At Paragraph 24 of the CIA, the Applicants set out that eight links were screened out of the DCO Environmental Statement. These links have also been screened out of the CIA on the basis that they were screened out of the original assessment. It is not understood why these links would automatically be screened out for a CIA; the potential exists that the combination of impacts across the projects might result in an impact that triggers the original screening thresholds, that does not occur when looking at the Applicants' projects impacts in isolation. As indicated at paragraph 5.2 of our Deadline 5 Response (REP5-055), the LHA disagrees with dismissing impacts on this basis.	Please see response at ID13.
15	It is noteworthy that Link 9 (B1069 north of junction with A1094) is the only link at 'Table 2.4 Pedestrian Amenity (Scenario A)' where a potentially significant impact has not been identified. It is understood that this is because the receptor has a low sensitivity, but the Magnitude of Effect of the impact is 'Medium'. As no criteria exists to determine where the differentiation is between a 'Medium' and 'High' Magnitude of Effect in 'Pedestrian Amenity' this is a judgement made by the assessor, as set out in their response at ID4 of REP4-025 and	Please see response at ID13.

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	inherently brings a small, in this case, level of risk to the conclusions of the assessment as they are not being based on a quantifiable metric.	
16	There is a similar issue at 'Table 2.5 Pedestrian Amenity (Scenario B)', where Links 9 (B1069 north of junction with A1094) and 12 (Sizewell Gap) also have Magnitude of Impacts determined to be 'Medium' based on 131% and 166% changes in HGV numbers in Scenario B, as to how you define a High Magnitude of Effect, which would change the potential significance of the impact. Again, as set out at ID5 REP4-025, this is a judgment made by the assessor and inherently brings a small, in this case, level of risk to the conclusions of the assessment as they are not being based on a quantifiable metric.	Please see response at ID13.
17	At Paragraph 37 of the CIA the potential for a Moderate Adverse Impact on Yoxford in the Early Years is identified. The LHA welcomes the proposed mitigation as set out at Paragraph 41 to mitigate the Projects' proportional impact at this location.	Please see response at ID13.
18	At Paragraph 48 of the CIA potentially significant cumulative impacts at Marlesford are identified. The LHA welcomes the proposed mitigation as set out at Paragraph 50 to mitigate the Projects' proportional impact at this location. Due to the significant works proposed by EDF on Lovers Lane it is agreed that no practical mitigations measures are deliverable at this location in addition to those proposed by EDF.	Please see response at ID13.
19	As set out in our Deadline 3 Response (REP3-102), the LHA looks for the applicant and Sizewell C Company to continue to work cooperatively and to minimise the potential for project interference and associated impacts on the highway network. It is noted that the parties have entered into a Statement of Common Ground on this matter.	Please see response at ID13.

ID	SCC Comment	Applicants' Comments
20	As per paragraph 5.3 the LHA's Deadline 5 Response (REP5-055) we remain concerned that in-combination effects on communities are not being identified.	Please see response at ID13.
Outline Travel Plan [REP6-014]		
21	With regards to the additional text inserted at Paragraph 7 regarding reference to the Outline Port Construction Traffic Management Plan, it is not understood what is meant by 'potation' traffic generated or whether this is a typo. Please can this be clarified.	The Applicants clarify this is a typo and should read 'operation'.
22	The LHA welcomes the commitment to submitting to the councils the contact details of relevant transport coordinators prior to commencement of construction, as set out at paragraph 21.	Noted.
23	The LHA welcomes the commitment to entering into a Planning Performance Agreement for a number of elements of the project, including monitoring final management plans as set out at paragraph 23. However, until such time as this is agreed to the Authority's satisfaction SCC maintains its position regarding the necessity of Protective Provisions. The LHA has made comments on this in the response to the Outline Access Management Plan within this document.	Noted. The Applicants have accepted SCC's revisions and this is reflected in the Deadline 8 ***OCTMP*** (document reference 8.9), ***Outline Access Management Plan*** (document reference 8.10) and ***Outline Travel Plan*** (document reference 8.11)
24	The LHA welcomes the commitment to publishing a record of all incidents in the quarterly report, as set out at paragraph 50.	Noted.
25	The LHA welcomes the commitment to publishing the quarterly monitoring report as set out at paragraph 50, which addresses our comment raised on this issue at paragraph 3.46 in our Deadline 4 response (found here: https://infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/upload	Noted.

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	s/projects/EN010077/EN010077-003503-SCC%20Highways%20Deadline%204.pdf).	
Outline Construction Traffic and Management Plan [REP6-010]		
26	With regards to the additional text inserted at Paragraph 7 regarding reference to the Outline Port Construction Traffic Management Plan, it is not understood what is meant by 'potation' traffic generated. Please can this be clarified.	The Applicants clarify this is a typo and should read 'operation'.
27	The LHA welcomes the commitment to submitting to the councils the contact details of relevant transport coordinators prior to commencement of construction, as set out at paragraph 20. Reference is made to consultation with the relevant planning authority. For consistency with the OPCTMP this should be in consultation with the relevant local highway authority and relevant planning authority.	The Deadline 8 ***OCTMP*** (document reference 8.9),clarifies:: *Prior to the commencement of works, the final CTMP would need to be approved by Suffolk County Council (SCC) in consultation with the relevant Local Planning Authority.*
28	The LHA welcomes the commitment to entering into a Planning Performance Agreement for a number of elements of the project, including monitoring final management plans as set out at paragraph 22. The LHA has made comments on this in the response to the Outline Access Management Plan within this document.	The Applicants have accepted SCC's revisions and this is reflected in the Deadline 8 ***OCTMP*** (document reference 8.9) and ***Outline Access Management Plan*** (document reference 8.10).
29	The LHA welcomes the inclusion of the forecast figures for HGV movements provided at Table 2.1 and Table 2.2. However, it needs to be ensured that adequate monitoring is in place on HGV routeing to ensure that the figures assessed in the ES are not exceeded.	Noted. Monitoring is discussed in the Applicants' response at ID31.
30	The LHA assumes that paragraph 44 refers to Requirements 23 and 24 in the dDCO which states what construction activities may take place outside normal working hours.	SCC's interpretation is correct. This is clarified in the Deadline 8 ***OCTMP*** (document reference 8.9)

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31	While the LHA welcomes the proposed measures to control out of hours movements set out in paragraph 54 it does not fully resolve all our concerns. The location of waiting or parking areas for drivers should be agreed with the LHA to avoid selection of unsuitable sites. Opening up of the site before 0700 may address concerns of HGVs arriving early stopping on the highway near the site, but does not control overnight movements of HGVs through local communities.	The measures set out in the ***OCTMP***, Paragraph 54 (REP6- 009) have been augmented with the commitment to provide Automatic Number Plate Recognition Cameras (ANPR) at Accesses 1, 2 and 10 (see the Outline Access Management Plan (document reference 8.10)). This will provide further monitoring of HGV delivery timings. The ANPR registrations can be traced to delivery documents to provide an audit trail of vehicle movements. The Applicants' consider the total monitoring measures combined with the enforcement measures set out in the ***OCTMP***, Section 4.3 (REP6-009) represents robust controls for the Projects' HGV traffic. The Deadline 8 ***OCTMP*** (document reference 8.9) has been amended to contain the commitment that HGV parking and layover areas will be agreed with SCC prior to inclusion in driver packs.
32	The LHA remains concerned that large delivery vehicles may park at unsuitable location and / or travel through local communities between 1900 and 0700 (weekdays) or 1300 Saturday to 0700 Monday.	Please refer to Applicants' response at ID31.
33	The LHA welcomes the commitment at paragraph 62 that non-special order abnormal loads would be subject to the same delivery route restrictions as HGVs. Paragraph 60 notes that special order AIL movements would be outside normal time restrictions. The Authority would ask that the Applicant confirms that this is acceptable to the police, as escorted loads are usually restricted to daylight hours.	Please refer to the Applicants' response to ID7 – the special Order AILs will be subject to the ESDAL process which will enable the police to direct haulage times.
34	The LHA welcomes the commitment at paragraph 64 to a 70% Euro-VI standard HGV fleet should the project overlap with Sizewell C. As part of the record of HGVs delivering to site (paragraph 127) the Applicant should include the contractor and / or origin of the journey to assist in	It has been agreed with ESC to monitor fleet composition at point of Access in line with the ***OCTMP*** (document updated at Deadline 8, document reference 8.9). Should there be a non-compliance journey

ID	SCC Comment	Applicants' Comments
	calculating those vehicles going through the Stratford ST Andrew AQMA.	origin data will be supplied using delivery documentation to provide an audit trail.
35	The improvements to the A1094 / B1069 Friston junction (work no. 35) is planned to be delivered before needed for movement of the transformers (paragraph 72). If not completed before commencement, or even onshore preparation works, this is likely to disrupt movements to the site access south of Knodishall.	The Applicants confirm that the proposed works will be undertaken prior to the movement of transformers. The Applicants will agree the timing and nature of the these works with the relevant Highway Authority.
36	In discussions with the LHA the Applicant has not yet linked delivery of the A12/A1094 Friday Street works to specific work nos. The LHA view is that this safety scheme needs to be in place before any significant movements are generated through this junction. This would include works no 19 to 21 (if accessed from the B1122 / A1094), works 22, 23, 26, 30, 31,32, 33, 34 and 38 to 43, all of which use the A1094 and B1069 for access. The same rationale should be applied to the Snape Mitigation Scheme (paragraph 91 and Marlesford Mitigation Scheme (paragraph 95). This is so that the risks posed by additional project vehicle movements are mitigated and that construction does not interfere with these movements.	The Applicants confirm that Deadline 8 ***OCTMP*** (document reference 8.9) has been updated to state that the proposed works would be required prior to undertaking Works Nos. 19 to 23, 26, 30, 31, 32, 34, 38 to 43 (with the exception of the creation of highway accesses).
37	The traffic signals will be removed on completion of the later of the two projects or the roundabout associated with the SZC two village bypass (as paragraph 76), whichever is the sooner.	Noted. Deadline 8 ***OCTMP*** (document reference 8.9) has been updated for clarity. The S278 agreement submitted at Deadline 8 (document reference ExA.AS-37.D8.V1) makes provision for the removal or subsequent retention of the traffic signal solution.
38	The LHA welcomes the additional information regarding the measures that may be necessary to allow heavy loads to cross Marlesford Bridge. Although there the Authority accepts the procedure in principle the Applicant will need to provide details of how such measures will be implemented without creating delays to traffic using the A12. The	Please refer to Applicants' response to ID12.

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	Authority would not consider that traffic restrictions, closures or diversions during the day would be acceptable.	
39	The Applicants should not commence works nos 6, 8, 9, 11, 12, 13, 16, 17 and 18 and possibly 19 (if accessed from Sizewell Gap) until the Theberton Mitigation Scheme, not just works no 11 and 13 as stated in paragraph 87 as all these works are accessed off the Sizewell Gap and hence require construction traffic to pass through Theberton.	The Applicants confirm that the Deadline 8 ***OCTMP*** (document reference 8.9) has been updated to state that the proposed works would be required prior to commencement of Works Nos. 6, 8, 9, 11, 12, 13, 16, 17,18, 19 north of Hundred River, (with the exception of the creation of highway access).
40	In principle the Council welcomes inclusion of the Marlesford and Yoxford Amenity improvements to mitigate the cumulative impacts in combination with Sizewell C although some minor detailed design matters are still to be agreed. The LHA is of the view that there will be a point in time at which the likelihood of the temporal impact referred to in paragraphs 93 and 97 can be assessed and that time is immediately after a decision is made by the Applicant and EDF to proceed with the projects, if permitted.	Noted.
41	In paragraph 100 the LHA would still prefer the 'where required' is removed as this is considered the appropriate mechanism for technical approval.	S278 agreement may not be necessary or appropriate for all off-site highway works. Clarification is provided in the Deadline 8 ***OCTMP*** (document reference 8.9)
42	The LHA considers that a temporary 40mph speed limit will be required for the duration of the traffic signal control of the A12/A1094 junction. And accepts that these restrictions will be implemented, subject to the due legal consultation and objection process, by SCC.	Noted.
43	The LHA preference is for trenchless methods of installation for the drainage under Church Road (paragraph 109) and the crossings of the B1353, B1122, B1069, Cloe Lane and Grove Road (paragraph 112). If the Applicant uses open cut trenches it is likely that reconstruction of	Noted. The Applicants maintain the position set out in the ***OCTMP*** submitted at Deadline 6 (REP6-010) that all roadworks to accommodate open cut trenches can be accommodated within the highway boundary and the Order limits.

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	parts of the carriageway and any adjacent footways will be necessary due to the inherent difficulties of backfilling trenches to avoid settlement. The LHA remains concerned whether the Applicants proposed method of traffic management (paragraph 114) is deliverable for the reasons set out in 3.2 to 3.7 of our deadlines 4 response (REP4-065).	
44	Paragraph 121 sets out that where it is available, information on GPS tracking of HGVs, as part of monitoring of routeing, will be made available to the transport coordinators. The LHA still considers that GPS tracking is the most robust method of tracking HGVs. While appreciating the Applicants concerns that this could exclude small delivery companies due to cost of the equipment this has not been evidenced.	The Applicants consider the commitment to *"ensure that where suppliers' HGVs are fitted with a monitoring system, that these are activated, and records are made available"* provides assurance to SCC that a system will be implemented. The details and fleet composition will be determined during the final discharge of the Construction Traffic Management Plan when the metrics are better informed by contractor input. This system, combined with the automatic number plate recognition system, will provide an appropriate means to manage and audit HGV deliveries.
45	The LHA welcomes the commitment to publishing the quarterly monitoring report as set out at paragraph 130 which addresses our comment raised on this issue at paragraph 3.27 in our Deadline 4 response (found here: https://infrastructure.planninginspectorate.gov.uk/wpcontent/ipc/uploads/projects/EN010077/EN010077-003503-SCC%20Highways%20Deadline%204.pdf). The LHA welcomes at paragraph 132 the inclusion of failure to achieve the required EURO-VI standard as a breach. The LHA welcomes the inclusion of construction HGV traffic not parking in designated areas as a breach, but information is sought on how this is planned to be monitored.	Noted.

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Outline Access Management Plan [REP6-011]		
46	The LHA welcomes the commitment to entering into a Planning Performance Agreement for a number of elements of the project, including monitoring final management plans as set out at paragraph 12. However, until such time as this is agreed to the Authority's satisfaction, SCC maintains its position regarding the necessity of Protective Provisions. A number of alterations (in italics) are proposed to paragraphs 12 and 13. 12.The Applicants have agreed to enter into a Planning Performance Agreement (PPA) with SCC. The PPA will allow SCC to recover reasonable costs for activities including but not limited to the following: • Additional costs of routine, cyclic and emergency highway maintenance resulting from the Applicants' occupation or use of the highway; • Visual and structural condition surveys of the highway (A1094, B1069, B1122, Lovers Lane, Sizewell Gap and parts of A12) and contributions towards structural repairs ~~inspection of highway and SCC review of inspection reports~~; • ~~Structural~~ Surveys *and assessment of highway structures* to facilitate AIL movements; • Damage to the Highway (in accordance with the provisions of Section 59 Highways Act 1980); • Creation of temporary traffic regulation orders (including SCC consultation and issue of permits); • ~~Assessments of highway structures~~;	The Applicants have agreed SCC's proposed textual revisions (incorporated into the Deadline 8 ***OCTMP*** (document reference 8.9). and ***OAMP*** (document reference 8.10). The Applicants therefore consider that protective provisions are not required.

ID	SCC Comment	Applicants' Comments
	• Relocating / removing street furniture and all other highway infrastructure *to facilitate AIL movements*; • *Technical approval and inspection of highway accesses (requirement 16) and offsite highway works as detailed in the approved construction traffic management plan. and* • Review of submitted materials for monitoring the final management plans (such as CTMP/ Travel Plan / PRoW Strategy etc).	
47	Section 59 of the Highways Act 1980 sets out a mechanism to allow the LHA to recover expenses of maintaining a highway that are due to 'extraordinary traffic' but in cases of dispute requires in section 59(2) 'such expenses as may be proved to the satisfaction of the court…' The LHA would seek to avoid this a need for protracted disagreement on such a matter. Section 59(3) allows the issue to be resolved by prior agreement, and the LHA considers that this is a preferable approach and seeks confirmation from the Applicants through agreement that damage is defined as defects described in the authority's Highways Maintenance Operational Plan and restricted to agreed HGV or AIL access roads. https://www.suffolk.gov.uk/assets/Roads-and-transport/how-we-managehighway-maintenance/v2.0-HMOP-2019-Final-Live-15-07-19a.pdf	Noted. Further comments on suggested maintenance revisions set out in the Applicants' response at ID48.
48	In undertaking works on the public highway, the Applicants shall ensure through appropriate agreements and approvals that: • The areas of the public highway occupied pursuant to Articles 12, 13 or 15 of the DCO are maintained *to the standards defined in SCC's Highways Operational Management Plan* ~~reasonable satisfaction of the SCC (as the local highway~~	The Applicants' response to bullet points as follows: • Agreed • Agreed • The Applicants suggest that the notice period aligns with the NRSWA/Statutory Guidance for highway authority permit

ID	SCC Comment	Applicants' Comments
	~~authority)~~ (taking account of the *category of highway asset* ~~use to which it is currently being put~~) during that period of occupation. • The Applicants shall ensure that *the periods and physical extents of occupation are defined, and that SCC is protected* ~~SCC is provided reasonable protection~~ against third party claims caused by the Applicants' occupation of the public highway pursuant to Article 12, 13 or 15 of the DCO. • In seeking to temporarily stop up, alter, divert or use as a temporary working site a street to which Article 12(5)(c) of the DCO applies, *the Applicants shall* allow a reasonable *advance* notice period *with a minimum of 8 weeks*, (guidance2 suggests three months notice in certain circumstances) • *That the notwithstanding the above LHA is not unreasonably refused access to inspect or maintain the highway in accordance with its duties under the Highways Act 1980.* ~~SCC shall be provided with the ability to inspect the public highway with reasonable access during the works.~~	schemes notification period for works (i.e. Major Works 3months, Standard Works 10days and Minor Works 3days.) • Agreed These revisions are reflected in the updated Deadline 8 ***OAMP*** (document reference 8.10)
49	The LHA presumes that the reference to the turn from B1122 into access 13 in paragraph 28 should be the B1121.	Correct. This reference is revised to B1121 in the Deadline 8 ***OAMP*** (document reference 8.10)
50	Paragraph 29 states that abnormal loads using accesses 1, 2, 5, 6, 9 and 10 will require pilot vehicle escort to allow vehicles to straddle lanes for access. The LHA considers that a method statement will be required to understand how this operation will be performed safely.	The Deadline 8 ***OAMP*** (document reference 8.10) has been updated to detail a requirement for abnormal load access method statement to be contained in the Onshore Preparation Works Management Plan.

ID	SCC Comment	Applicants' Comments
51	In 'Table 2.3 Access Visibility Requirements' a speed reduction is stated as being necessary for access 13 during construction but not when during the operational phase. The LHA understands from Table 2.1 that this access will only be used by special order movements. The Authority seeks clarification from the applicant that its understanding of the use of access 13 is correct.	Access 13 will be utilised for a peak 38 light commercial vehicle daily employee movements associated with the National Grid substations as confirmed in ***Table 2.1*** of the ***OAMP*** (REP6-011).
52	The LHA accepts the Authority will raise the necessary legal orders for temporary speed limits or other restrictions using its statutory powers (paragraph 39 and 45) provided that the necessary agreements are in place to recover its reasonable expenses (as paragraph 12).	Noted.
53	The wording of paragraph 42 'in accordance with the provisions of DCO Requirement 16' are acceptable to the LHA provided that the wording of paragraph 12 above is accepted by the Applicant.	Noted.
54	The LHA accepts that road safety audits should comply with the principles of DMRB GG119 although does note that any departures from design standards should be brought to the auditors' attention as part of this process.	Noted.
55	Paragraph 51 does not address how pedestrians will be protected during construction of accesses.	Additional pedestrian clarification is contained in the Deadline 8 ***OAMP*** (document reference 8.10)
56	The LHA does not object to the principle of a temporary reduction in speeds to 30mph, but notes that signing in isolation may not ensure adequate compliance with these restrictions.	Noted. The contractor will keep speeds under constant review and report any issues through the quarterly monitoring report provided for in the ***OCTMP*** (document reference 8.9).
57	The proposed measures to safeguard access to Sizewell as set out in paragraph 55 to 59 would be acceptable to the LHA.	Noted

ID	SCC Comment	Applicants' Comments
58	The proposal of an Onshore Preparation Works Management Plan is welcomed by the LHA, although we would consider many of the measures such as HGV routes and restrictions on access should follow the same principles included in the OCTMP. The proposal to keep SCC informed of the contractors' representative is welcomed.	Noted.
59	The LHA would ask that the Applicant clarifies paragraph 74. This appears to state that operational access to the substation via the B1121 will require large vehicles to arrive and depart from the A1094 east of the B1121. As there are no suitable locations on the A1094 to turn large vehicles this implies that they will need to use the B1069 and B1122. The LHA would request that the Applicant examines the practicality, or otherwise, of modifying the A1094/B1121 junction within the limits of the existing public highway.	The Applicants have clarified this statement in the Deadline 8 ***OAMP*** (document reference 8.10). A route is proposed via the B1122 through Leiston to ensure that HGVs are not 'u' turning or reversing on the highway network.
Outline Port Construction Traffic Management and Travel Plan [REP6-047]		
60	The LHA welcomes the agreement in paragraph 8 to liaise with the Authority regarding the impact of port construction vehicles within SCC's administrative boundary. However, the LHA considers that the suggested wording is imprecise and needs to be improved. The LHA is disappointed to note that in the Applicants' Comments on SCC's Deadline 5 submissions, (as also submitted at Deadline 6), the Applicants state (item 2.1 ID6) it is to be left to the highway authority for the (non-Suffolk) port to determine whether to consult with SCC (or any other highway authority) on the final PCTMP. There is therefore a mismatch between the Applicants' formal position, as secured by the DCO Requirement 36, and the terms of the OPCTMTP. SCC considers that there is a need both for Requirement 36 and the OPCTMTP to spell out an explicit need for consultation with SCC as LHA. Clearly, if port construction traffic would have no implications for the local	The ***Outline Port Construction Traffic Management and Travel Plan*** has been updated at Deadline 8 (document reference ExA.AS-9.D8.V3) to provide clarification that the Applicants will consult with SCC following the selection of a preferred port location.

ID	SCC Comment	Applicants' Comments
	highway network in Suffolk (because the selected port was remote from Suffolk), then SCC's consultation response would be to that effect. However, whilst the Applicants wish to maintain the flexibility of not specifying a port at this stage, and it is clear that there are non-Suffolk ports only a short distance from Suffolk (including Great Yarmouth), it is important that SCC is consulted on the PCTMTP	
61	With regard to paragraph 16, the LHA has commented on the assessment methodology in the LIR and subsequent submissions, noting that it is reliant on subjective interpretation of local conditions (REP3-039). Notwithstanding this position the Authority notes that SPR have been willing to consider the LHA's views when undertaking these assessments and reaching a mutually agreed position.	Please refer to the Applicants' response at ID 13 to 20.
62	The authority would accept a sustainable transport audit (paragraph 18) provided the findings can be meaningfully communicated to workers and opportunities taken (paragraph 24) to reduce travel by car.	Noted.
63	Care should be taken that this project, when considering the permitted port development traffic in paragraph 27, takes due consideration of other permitted projects collocated at the relevant port. The LHA also notes the proposed screening exercise for air quality and noise (paragraph 29 and 30) but would defer to ESC who are the responsible authority for these matters.	Noted.
64	The LHA welcomes the commitment at Paragraph 30 to submitting a screening report as to ascertain the requirement for a Transport Assessment.	Noted.

ID	SCC Comment	Applicants' Comments
Outline Code of Construction Practice [REP6-003]		
65	The LHA welcomes the Applicants commitment to enter into a Planning Performance Agreement as stated in paragraph 17.	Noted.
66	The LHA recognises the necessity of undertaking some activities such as concrete pours outside normal working hours but would expect that this should be avoided when possible. The LHA understands that police only escort AILs during daylight hours for safety reasons.	Noted.
Written Summary of Oral Case ISH9 [REP6-054]		
67	Provided the Applicant accepts that sufficient notice needs to be given to the LHA to undertake certain legal actions associated with street works and this is reflected in a planning performance agreement the Authority would withdraw its request to increase the 28 day period for deemed approval in articles 12, 13 and 15.	Noted.